

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

**ERICSSON INC., AND
TELEFONAKTIEBOLAGET LM ERICSSON,**

Plaintiffs,

v.

**TCL COMMUNICATION TECHNOLOGY
HOLDINGS, LTD., TCT MOBILE LIMITED,
AND TCT MOBILE (US), INC.,**

Defendants.

Civil Action No. 2:15-cv-00011-RSP

JURY TRIAL

**JOINT MOTION TO FOR LEAVE TO TAKE THE DEPOSITION OF
CHRISTOPHER A. MARTINEZ AFTER THE CLOSE OF EXPERT DISCOVERY**

Pursuant to Federal Rule of Civil Procedure 16(b), Defendants TCL Communication Technology Holdings, Ltd., TCT Mobile Limited, and TCT Mobile (US), Inc. (“TCL”) and Plaintiffs Ericsson Inc. and Telefonaktiebolaget LM Ericsson (“Ericsson”) hereby submit this Joint Motion for Leave to Take the Deposition of Christopher A. Martinez After the Close of Expert Discovery, and in support, show as follows:

The expert discovery deadline in this case is February 8, 2016. (Dkt. 190). The deposition of Ericsson’s damages expert, Robert Mills, is scheduled for January 27, 2016. TCL’s damages expert, Christopher A. Martinez, will be traveling abroad from January 27, 2016, through February 7, 2016. In order to accommodate Mr. Mills’ and Mr. Martinez’s schedules, the parties respectfully request leave for Ericsson to depose Mr. Martinez on February 9, 2016, one day after the close of expert discovery. This will not affect any set deadlines in the current Docket Control Order.

Dated: January 6, 2016.

/s/ David Sochia

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served on all counsel of record via the Court's ECF system on January 6, 2016.

/s/ Michael F. Carr

Michael F. Carr